



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 8**  
**999 18<sup>TH</sup> STREET - SUITE 500**  
**DENVER, CO 80202-2466**  
**Phone 800-227-8917**  
**<http://www.epa.gov/region08>**

March 24, 2006

Ref: 8EPR-SR

Stephen Young  
336 Pioneer Road  
Libby, MT 59923

Dear Mr. Young,

You requested information regarding Environmental Protection Agency (EPA) protocol for landscaping. Specifically, the requirements for installing sod versus hydroseed.

When designing the cleanup approach for Libby, EPA's primary goal is to develop a program that is protective of human health. EPA evaluated many aspects of property cleanup, including restoration, when developing the clean up program. Feasibility of a cleanup remedy, as well as cost, are factored into the decision process. EPA attempts to restore each property to as close to the original condition as possible. EPA has determined that the cost of sod prevents us from restoring every yard excavation entirely with sod (sod is typically three times the cost of hydroseed). Those dollars could instead be put toward additional property clean up actions. Experience in Libby has shown that given an adequate establishment period, hydroseed will restore a yard as completely as sod.

Using a typical downtown lot size as a starting point, EPA determined that 30 feet from the house in each direction would adequately cover a typical yard with sod. Excavations beyond this distance would be restored with hydroseed. Although this is a general rule-of-thumb, EPA looks at each property on an individual basis. In some cases, EPA has gone beyond 30 feet from the house. In other cases, sod was not installed at all.

At your property, the excavation area next to your house (Area B) will be restored with sod. However, the distance from your house to the larger excavation area (Area A), and the large size of the excavation area, prohibit the government from restoring it with sod. I am aware that you have spoken with many members of the EPA team regarding your concerns. I visited your property, and reviewed the plans for clean up at your property, and I believe that hydroseed is the appropriate restoration choice.

If you have any further questions regarding the cleanup at your property, please feel free to contact Jessica Tonner, your Community Involvement Coordinator (CIC), at 406-293-

1433 or contact me at the EPA Information Center, 406-293-6194.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Cirian", with a stylized flourish at the end.

Mike Cirian, P.E.  
EPA Remedial Project Manager

cc: File  
Jessica Tonner, CIC